

FILED
11/11/2025
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
MAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Collectanea J. Limited,
Plaintiff,
v.

The Partnerships and Unincorporated Associations Identified on Schedule A,
Defendants.

Case No. 1:24-cv-07080
Judge Andrea R. Wood

SUPPLEMENTAL MEMORANDUM
IN SUPPORT OF EMERGENCY MOTION TO VACATE ASSET RESTRAINT AND
DISMISS

Submitted by: Victor Kochmarev ("Israland") – Pro Se Limited Appearance

COMES NOW Defendant Victor Kochmarev, appearing pro se for the limited purpose of contesting jurisdiction, and respectfully submits this Supplemental Memorandum to inform the Court of critical deficiencies in the Plaintiff's evidence supporting the Temporary Restraining Order ("TRO"). **I. THE EVIDENCE IS STALE AND CANNOT SUPPORT THE TRO**

1. Plaintiff recently sent Defendant unsolicited screenshots (attached as Exhibit A) allegedly showing eBay listings. These images are dated September 13, 2023.
2. The Plaintiff filed this lawsuit nearly one year later, on August 12, 2024.
3. Such evidence is fatally stale. Evidence that is 11 months old at the time of filing cannot satisfy the legal burden required for a Plaintiff to demonstrate imminent and irreparable harm necessary to justify an ex parte TRO and the extreme measure of freezing a non-resident's personal funds.
4. The Plaintiff's nearly one-year delay in filing suit based on this evidence strongly suggests a lack of urgency and that any alleged infringement is not continuing. **II. NO CURRENT INFRINGING ACTIVITY**

1. Defendant attaches a screenshot from his own eBay account (Exhibit B) showing no listings or sales related to Plaintiff's brand since November 2023.
2. This demonstrates that Defendant has not offered, sold, or displayed any such product during the last two years, and that the asset restraint is based entirely on outdated and speculative assumptions rather than any ongoing conduct.

III. PLAINTIFF'S IMPROPER EXTRAJUDICIAL CONDUCT

1. Plaintiff's unsolicited email communications containing extra-judicial "evidence" raise serious concerns about proper procedure and Due Process. If Plaintiff wishes to submit new evidence, it should be done through the Court, not via private correspondence with a foreign defendant appearing pro se.
2. The Plaintiff's reliance on year-old screenshots and direct communication with a foreign individual, rather than formal filings, constitutes an improper use of the TRO process that disproportionately burdens a non-resident defendant with no U.S. presence.

IV. REQUEST FOR RELIEF

For the foregoing reasons, Defendant respectfully requests that the Court:

1. Immediately vacate the Temporary Restraining Order and all related asset restraints;
2. Dismiss all claims against Defendant for lack of personal jurisdiction; and
3. Disregard any out-of-record evidence dated prior to the Complaint and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Victor Kochmarev

Pro Se (Limited Appearance)

Beer Sheva, Israel

Email: vityak@mail.ru

Dated: November 11, 2025

This filing is made solely to contest jurisdiction and asset restraint, and does not

constitute consent to the Court's personal jurisdiction.

Exhibit A – Screenshot of Plaintiff's "Evidence" (email with screenshot dated 09/13/2023, circled in red)

Exhibit B – Screenshot from Defendant's eBay account showing no listings or sales related to "Beadnova" or Plaintiff's brand since November 2023

Exhibit A

Abegail Corpuz <clerk@fordbanister.com>
7 ноября 2025, 7:47

Good Afternoon,

Please see the attached evidence and give us the information below to initiate negotiations for:

- The name of the individual and/or company that owns and operates the Internet Store(s), and the address of that individual and/or company
- A complete accounting of sales, including corroborating documentation supporting your representation of the number of units sold and the total revenue generated
- Supplier information, and
- Documents evidencing the steps your client took to verify that they could use any of the Trademarks/Copyrights owned by our client.

Please "reply all" to all correspondence so that the Firm may timely respond to any correspondence.

Only respond to this email thread regarding a settlement. We have a massive email traffic. Responses and inquiries in random email threads may confuse and delay negotiation

Kind regards,



Abegail Corpuz
Legal Assistant
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9/13/23, 4:36 PM



BEADNOVA 1Mm Elastic Stretch Crystal String Cord for Jewelry Making Bracelet Bea 705353802805 | eBay

Shop by category Search for anything All Categories Search

Back to search results Listed in category: Collectibles & Art > Crafts > Beads & Jewelry Making > Jewelry Making Cord & Wire Share | Add to Watchlist

BEADNOVA 1Mm Elastic Stretch Crystal String Cord for Jewelry Making Bracelet Bea

Condition: New

Price: **US \$7.80**

Buy It Now Add to cart Add to watchlist

Breathe easy. Free shipping and returns.

Shipping: Free Expedited Shipping. See details Located in: Denver, Colorado, United States

Delivery: Estimated between Sat, Sep 16 and Wed, Sep 20 to 60604

Returns: 30 days returns. Seller pays for return shipping. See details

Payments: PayPal Google Pay VISA Mastercard American Express Discover

PayPal CREDIT Special financing available. See terms and apply now

Earn up to 5x points when you use your eBay Mastercard. Learn more

Shop with confidence eBay Money Back Guarantee Get the item you ordered or your money back. Learn more

Seller information israeland (14) 100% positive feedback

Save seller Contact seller Visit store See other items

Have one to sell? Sell now

About this item Shipping, returns, and payments Report this item

Exhibit B

ebay Shop by category Search for anything All Categories Search

Seller Hub israeland (14) Messages (91)

Overview Orders Listings Marketing Advertising Store Performance Payments Research Reports

Manage all orders

Status: All orders Period: Custom Search by: Item title BEADNOVA Reset

11/12/2023 11/11/2025

Results: 0 Print | Download report

Some of the search, sort by and bulk order actions may not be available for orders older than 90 days.

Shipping Print coupon Relist Leave feedback More Sort by: Date paid

Actions	Order	Quantity	Subtotal	Total	Date sold	Date paid
We didn't find any results. Try searching with different criteria.						